

THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA  
*ex rel.* SAMANTHA GATES, and  
VANESSA PAWLAK,

Plaintiffs,

v.

CENTRIA HEALTHCARE, *et al.*,

Defendants

**No. 4:19-cv-10941-SDD-DRG**  
Hon. Stephanie Dawkins Davis, USDJ  
Hon. David R. Grand, USMJ

**STIPULATION FOR VOLUNTARY DISMISSAL OF PLAINTIFFS' CLAIMS  
PURSUANT TO RULE 41(a)(1)(A)(ii) AND  
THE UNITED STATES' NOTICE OF CONSENT TO DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff/Relators, Samantha Gates and Vanessa Pawlak (“Relators”), and Defendants, Centria Healthcare, Scott Barry, Alicia Kidwell, Kyle Kidwell, Richard Loewenstein, Steven Merahn, M.D., Mark Mitchell, Michelle Carter Pierce, Darren Schwartz, Jeffrey Steigerwald, and Christopher Wilcox, through their respective counsel, hereby stipulate to the dismissal of any and all of Relators’ claims in this action, with prejudice; and

request that the Clerk of the Court now close and dismiss this case with prejudice as to the claims of the Relators and without prejudice as to the claims of the United States of America.

**Dated: August 28, 2020**

**LAW OFFICES OF JOHN F. HARRINGTON**

*/s/ John F. Harrington* \_\_\_\_\_

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**Dated: August 28, 2020**

**THE HEALTH LAW PARTNERS, P.C.**

*/s/ Clinton Mikel* \_\_\_\_\_

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**THE UNITED STATES' NOTICE OF CONSENT TO DISMISSAL**

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General stipulates and consents to the dismissal of the claims of Relators with prejudice and to the dismissal of the claims of the United States of America without prejudice,

The United States requests that all other papers on file in this action currently under seal remain sealed because in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

**Dated: August 28, 2020**

**U.S. DEPARTMENT OF JUSTICE**

*/s/ Jonny Zajac* \_\_\_\_\_

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